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PAGE 26/27

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JUL 19 2007

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Scott J. Clifford et al.	)
	) Group Art Unit: 1734
Serial No.: 10/691,763	)
	) Examiner: G. Koch
Filed: October 23, 2003	)
	) Attorney Docket: 132815-7
For: <u>Modular Painting Apparatus</u>	) ( <u>formerly 16129</u> )

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

DECLARATION OF ROB KUPHAL UNDER 37 CFR 1.132

Honorable Sir:

Rob Kuphal declares as follows:

1. I received a Bachelor of Business Administration degree in Marketing in 1988 from Western Michigan University.
2. From 2000 to date, I have been employed by Fencor Robotics America, Inc., Rochester Hills, Michigan, of the above application. My present position is Account Manager, Paint Systems Automation Group.
3. I have reviewed the declaration document, dated July 17, 2007 of Scott Clifford and Paul Cypioni, inventors of the above identified patent application and can attest to the market impact this machine has had to the industry and in particular to my customer Ford Motor Company.
4. To date Ford has purchased over 130 of these units at more than 7 assembly plants.
5. Ford considers this technology as the wave of the future as it offers them an excellent level of flexibility while significantly reducing their booth space requirements. The P500 design specifically helps Ford with their Bulletin 131 safety requirements.
6. Furthermore, all of Ford's future paint shop design layouts are based on the P-500 platform for exterior painting.

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1

PAGE 26/27 \* RCVD AT 7/19/2007 8:59:18 AM [Eastern Daylight Time] \* SVR:USPTO-EFAXF-3/1 \* DNIS:2738300 \* CSID:2486841243 \* DURATION (mm:ss):11-04

PAGE 58/63 \* RCVD AT 11/26/2008 9:08:54 AM [Eastern Standard Time] \* SVR:USPTO-EFAXF-5/16 \* DNIS:2738300 \* CSID: \* DURATION (mm:ss):10-54

07/19/2007 07:57 2486841243

PAGE 27/27

7. From a market share standpoint, prior to the introduction of the P500 robot, FANUC Robotics had only about 5% of the market share at Ford for exterior painting and we were relegated to mainly interior and cut-in applications. Since the P-500 launch, FANUC Robotics now has over 90% of the exterior market share for new system sales.

8. Key successes include the installation at Kansas City truck where P500's are used for Ford's Wet on Wet Tu-Tone process. A Ford innovation of paint application technology combined with Fanuc Robotics' P-500 robot system technology. We were able to use their existing booth space to accomplish this process. Ford awarded FANUC Robotics the entire exterior top coat application for their new Ford 500 product at the Chicago Assembly plant resulting in 40 P500 robots and a \$12M USD investment.

9. The product is deemed extremely versatile in application and process as the P-500 applies paint to a wide range of Ford products from it's small car platform (Focus / Fusion), mid size platform (500 and MKZ), up to it's largest vehicles (Expedition, F-Series Trucks). The product is also used for both application of paint and vehicle door manipulation for interior work.

10. Ford motor company engineers view the P-500 as "light years" ahead of competitive products and the "industry benchmark" for exterior paint process. The value to Ford is seen as exceptional for process capability, cost, installation, and launch timing. All accomplished at the lowest risk to production. The P-500 has catapulted FANUC Robotics to being the industry leader in exterior automotive finishing.

11. I further declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the above-referenced application or any patent issuing thereon.

Date: July 19, 2007

By

ROB KUPHAL

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2

PAGE 27/27 \* RCVD AT 7/19/2007 8:59:18 AM [Eastern Daylight Time] \* SVR:USPTO-EFAXF-21 \* DNIS:2738300 \* CSID:2486841243 \* DURATION (mm-ss):11-04

PAGE 59/63 \* RCVD AT 11/26/2008 9:08:54 AM [Eastern Standard Time] \* SVR:USPTO-EFAXF-5/16 \* DNIS:2738300 \* CSID: \* DURATION (mm-ss):10-54